

Joseph H. Neiman

ATTORNEY AT LAW

85 MAIN STREET, SUITE 302
HACKENSACK, NEW JERSEY 07601

TEL: (201) 487-0061

FAX: (201) 883-0767

E-MAIL: JNEIMANESQ@GMAIL

NEW YORK OFFICE

FEB 23 2015

MEMBER NJ & NY BAR

179-36 80TH ROAD
JAMAICA ESTATE, NEW YORK 11432

February 17, 2015

WM. PENN LIFE INS. CO. OF N.Y.

RECEIVED

FEB 23 2015

CLAIMS DEPT.

VIA CERTIFIED MAIL

William Penn Life Insurance Company
100 Quentin Roosevelt Boulevard
P.O. Box 519
Garden City, NY 11530

Attention: Legal Department

RE: Reichman, et als. vs. William Penn Life Insurance Company of New York
Docket No. BER-L-1255-15

Dear Sir:

Enclosed please find a summons and complaint against William Penn Life Insurance Company of New York with regard to the above-referenced matter which I hereby serve upon you. I am also enclosing a copy of the Track Assignment Notice with regard to this matter. Please advise if you will accept service of process via mail by signing and faxing a copy of this letter to me or if you wish to be served through a process server.

Very truly yours,

J
Joseph H. Neiman

JHN: djb
Enclosures

I hereby accept service of process of the
Within Summons and Complaint this
____ day of _____, 2015

Name:

Title:

Letters to court/S&C via certified mail, Reichman, Wm Penn

Attorney (s): **JOSEPH H. NEIMAN, ESQ.**
Law Firm:
Address: **85 MAIN STREET, SUITE 302**
HACKENSACK, NEW JERSEY 07601

Telephone No.: **(201) 487-0061**
Fax No.: **(201) 883-0767**
Attorney (s) for Plaintiff (s):

**STUART REICHMAN, KAREN BETH
SMERLING, and LISA ESTHER
LEBOVIC,**

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – BERGEN COUNTY**

Plaintiffs,

DOCKET NO. L-1255-15

vs.

Civil Action

**WILLIAM PENN LIFE INSURANCE
COMPANY OF NEW YORK,**

SUMMONS

Defendant.

From the State of New Jersey

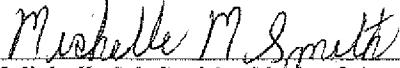
To the Defendants (s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deputyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

Dated: February 17, 2015


Michelle M. Smith, Clerk of the Superior Court

Name of Defendant to be Served:	William Penn Life Insurance Company of New York Legal Department 100 Quentin Roosevelt Boulevard P.O. Box 519 Garden City, NY 11530
Address for the Defendant to be Served:	

Note: The Case Information Statement is available at www.njcourts.com

**Directory of Superior Court Deputy Clerk's Offices
County Lawyer Referral and Legal Services Offices**

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401

LAWYER REFERRAL
(609) 345-3444
LEGAL SERVICES
(609) 348-4200

BERGEN COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601

LAWYER REFERRAL
(201) 488-0044
LEGAL SERVICES
(201) 487-2166

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Fl., Courts Facility
49 Rancocas Rd.
Mt. Holly, NJ 08060

LAWYER REFERRAL
(609) 261-4862
LEGAL SERVICES
(609) 261-1088

CAMDEN COUNTY:

Deputy Clerk of the Superior Court
Civil Processing Office
Hall of Justice
1st Fl., Suite 150
101 South 5th Street
Camden, NJ 08103

LAWYER REFERRAL
(856) 482-0618
LEGAL SERVICES
(856) 964-2010

CAPE MAY COUNTY:

Deputy Clerk of the Superior Court
9 N. Main Street
Cape May Court House, NJ 08210

LAWYER REFERRAL
(609) 463-0313
LEGAL SERVICES
(609) 465-3001

CUMBERLAND COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
60 West Broad Street
P.O. Box 10
Bridgeton, NJ 08302

LAWYER REFERRAL
(856) 696-5550
LEGAL SERVICES
(856) 691-0494

ESSEX COUNTY:

Deputy Clerk of the Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102

LAWYER REFERRAL
(973) 622-6204
LEGAL SERVICES
(973) 624-4500

GLOUCESTER COUNTY:
Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
First Fl., Court House
1 North Broad Street
Woodbury, NJ 08096

LAWYER REFERRAL
(856) 848-4589
LEGAL SERVICES
(856) 848-5360

HUDSON COUNTY:
Deputy Clerk of the Superior Court
Superior Court, Civil Records Dept.
Brennan Court House--1st Floor
583 Newark Ave.
Jersey City, NJ 07306

LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6363

HUNTERDON COUNTY:
Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822

LAWYER REFERRAL
(908) 236-6109
LEGAL SERVICES
(908) 782-7979

MERCER COUNTY:
Deputy Clerk of the Superior Court
Local Filing Office, Courthouse
175 S. Broad Street, P.O. Box 8068
Trenton, NJ 08650

LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

MIDDLESEX COUNTY:
Deputy Clerk of the Superior Court,
Middlesex Vicinage
2nd Floor - Tower
56 Paterson Street, P.O. Box 2633
New Brunswick, NJ 08903-2633

LAWYER REFERRAL
(732) 828-0053
LEGAL SERVICES
(732) 249-7600

MONMOUTH COUNTY:
Deputy Clerk of the Superior Court
Court House
P.O. Box 1269
Freehold, NJ 07728-1269

LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

MORRIS COUNTY:
Morris County Courthouse
Civil Division
Washington and Court Streets
P. O. Box 910
Morristown, NJ 07963-0910

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 285-6911

OCEAN COUNTY:
Deputy Clerk of the Superior Court
118 Washington Street, Room 121
P.O. Box 2191
Toms River, NJ 08754-2191

LAWYER REFERRAL
(732) 240-3666
LEGAL SERVICES
(732) 341-2727

PASSAIC COUNTY:
Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505

LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 523-2900

SALEM COUNTY:
Deputy Clerk of the Superior Court
Attn: Civil Case Management Office
92 Market Street
Salem, NJ 08079

LAWYER REFERRAL
(856) 935-5629
LEGAL SERVICES
(856) 691-0494

SOMERSET COUNTY:
Deputy Clerk of the Superior Court
Civil Division
P.O. Box 3000
40 North Bridge Street
Somerville, N.J. 08876

LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840

SUSSEX COUNTY:
Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

UNION COUNTY:
Deputy Clerk of the Superior Court
1st Fl., Court House
2 Broad Street
Elizabeth, NJ 07207-6073

LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

WARREN COUNTY:
Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07823-1500

LAWYER REFERRAL
(908) 859-4300
LEGAL SERVICES
(908) 475-2010

BERGEN COUNTY COURTHOUSE
SUPERIOR COURT LAW DIV
BERGEN COUNTY JUSTICE CTR RM 415
HACKENSACK NJ 07601-7680

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (201) 527-2600
COURT HOURS 8:30 AM - 4:30 PM

DATE: FEBRUARY 09, 2015
RE: REICHMAN VS WILLIAM PENN LIFE INSURANCE COMPANY
DOCKET: BER L -001255 15

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON ESTELA M. DE LA CRUZ

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002
AT: (201) 527-2600.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: JOSEPH H. NEIMAN, ESQ.
NEIMAN JOSEPH H
65 MAIN STREET
SUITE 302
HACKENSACK NJ 07601

JUBCAR7

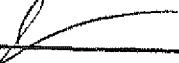
PARKING NOTICE

Through July 31, 2015

Visitors to the Justice Center are
directed to the Lot located at
150 River St., Hackensack,

Regular shuttles round trip
available from 7:30 am to 7:00 pm

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS)		<small>FOR USE BY CLERK'S OFFICE ONLY</small> <small>PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA</small> <small>CHG/CK NO.</small> <small>AMOUNT:</small> <small>OVERPAYMENT:</small> <small>BATCH NUMBER:</small>
	Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed		
ATTORNEY / PRO SE NAME Joseph H. Neiman		TELEPHONE NUMBER (201) 487-0061	COUNTY OF VENUE Bergen
FIRM NAME (If applicable)		DOCKET NUMBER (when available) L-1255-15	
OFFICE ADDRESS 85 Main Street, Suite 302 Hackensack, NJ 07601		DOCUMENT TYPE Complaint	
		JURY DEMAND <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
NAME OF PARTY (e.g., John Doe, Plaintiff) Plaintiffs, Stuart Reichman, Karen Beth Smerling and Lisa Esther Lebovic		CAPTION Stuart Reichman, Karen Beth Smerling and Lisa Esther Lebovic vs. William Penn Life Insurance Company of New York	
CASE TYPE NUMBER <small>(See reverse side for listing)</small> 599	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <small>IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.</small>	
RELATED CASES PENDING? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<small>IF YES, LIST DOCKET NUMBERS</small>	
DO YOU ANTICIPATE ADDING ANY PARTIES <small>(arising out of same transaction or occurrence)?</small> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (If known) <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN	
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.			
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION			
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input checked="" type="checkbox"/> BUSINESS		
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION			
 Do you or your client need any disability accommodations? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, please identify the requested accommodation	
Will an interpreter be needed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, for what language?	
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).			
ATTORNEY SIGNATURE: 			

FAX CENTER
No. 7012

Date Filed	2/4/15
Payment #	5248
CA	OK
CC	MO CG
Amount	250
Payor	JOSEPH H. NEIMAN
Batch/Ref/Case #	848

JOSEPH H. NEIMAN
Attorney at Law
ID No. 013541985
85 Main Street, Suite 302
Hackensack, New Jersey 07601
(201) 487-0061

SUPERIOR COURT BERGEN COUNTY
FILED

FEB 04 2015

Laura A. Smerling
DEPUTY CLERK

Attorney for Plaintiff, Stuart Reichman, Karen Beth Smerling and Lisa Esther Lebovic

STUART REICHMAN, KAREN BETH
SMERLING, and LISA ESTHER
LEBOVIC,

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - BERGEN COUNTY

Docket No. L-1255-15

Plaintiffs,

Civil Action

vs.

WP
WILLIAM PENN LIFE INSURANCE
COMPANY OF NEW YORK,

**COMPLAINT AND
JURY DEMAND**

Defendant.
S99

Plaintiffs, Stuart Reichman residing at 99 Griggs Avenue, Teaneck, in the Township of Teaneck, County of Bergen and State of New Jersey, Karen Beth Shmerling, residing at pob 144 Kochav Hashachar, Mizrach Binyamin 90641, Israel and Lisa Esther Lebovic residing at Baba Sali 11/2, Betar Illit, Israel by and through their attorney, Joseph H. Neiman, Esq., complaining of the above Defendant alleges as follows upon information and belief:

COUNT ONE
Breach of Contract

1. Plaintiffs, Stuart Reichman, Karen Beth Shmerling, and Lisa Esther Lebovic are the sole beneficiaries of the Estate of Arom Reichman.
2. Defendant, William Penn Life Insurance Company of New York, is an insurance company with its offices located at 100 Quentin Roosevelt Boulevard, Garden

City, New York and is authorized to do business in the State of New Jersey and/or actually does business in the State of New Jersey.

3. Avrom Reichman entered into a Life Insurance Contract, Policy No. 0700012524 with William Penn Life Insurance Company of New York naming Stuart Reichman, Karen Reichman Shmerling, and Lisa Reichman Lebovic and Dianne Golub beneficiaries of the policy.

4. Said policy was in force when Avrom Reichman passed away on October 20, 2012.

5. Avrom Reichman and Dianne Golub were divorced on or about January 10, 1996, revoking any benefits due Dianne Golub by statute.

6. Diane Golub Rosenberg has signed an Affidavit of Renunciation and Renunciation of the Life Insurance Proceeds.

7. Despite due demand, Defendant, William Penn Life Insurance Company of New York has wrongfully withheld the insurance proceeds due to Stuart Reichman, Karen Beth Shmerling, and Lisa Esther Lebovic .

WHEREFORE, Plaintiffs demand judgment in favor of the Plaintiffs and against the Defendant in the amount of \$100,000.00, trebled damages, punitive damages, plus interest, attorney's fees, costs of suit and for such other and further relief as this court deems just and proper.

COUNT TWO
Consumer Fraud

1. Plaintiffs repeat and reiterate each and every allegation set forth in the First Count as though same were set forth at length herein.

2. Defendant's failure to pay is part of a scheme to accept payments and deny legitimate claims,

3. Said conduct is a violation of the NJ Consumer Fraud Act.

WHEREFORE, Plaintiffs demand judgment in favor of the Plaintiffs and against the Defendant in the amount of \$100,000.00, trebled damages, punitive damages, plus interest, attorney's fees, costs of suit and for such other and further relief as this court deems just and proper.

COUNT THREE
Fraud

1. Plaintiffs repeat and reiterate each and every allegation set forth in the First and Second Counts as though same were set forth at length herein.

2. Any and all denials by defendant to pay the legitimate claims of plaintiffs were done so fraudulently.

WHEREFORE, Plaintiffs demand judgment in favor of the Plaintiffs and against the Defendant in the amount of \$100,000.00, trebled damages, punitive damages, plus interest, attorney's fees, costs of suit and for such other and further relief as this court deems just and proper.

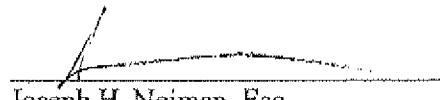
Dated: January 29, 2015


Joseph H. Neiman, Esq.
Attorney for Plaintiffs

JURY DEMAND

PLEASE TAKE NOTICE that Plaintiffs, Stuart Reichman, Karen Beth Shmerling, and Lisa Esther Lebovic, hereby demand a trial by jury on all issues so triable.

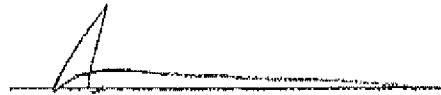
Dated: January 29, 2015


Joseph H. Neiman, Esq.
Attorney for Plaintiffs

CERTIFICATION

In accordance with the Rules, the undersigned hereby certifies that the within matter is not the subject of any other action pending in any other court or pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated.

Dated: January 29, 2015


Joseph H. Neiman, Esq.
Attorney for Plaintiff

SUPERIOR COURT BERGEN COUNTY
FILED

JOSEPH H. NEIMAN

Attorney at Law

ID No. 013541985

85 Main Street, Suite 302

Hackensack, New Jersey 07601

(201) 487-0061

Attorney for Plaintiff, Stuart Reichman, Karen Beth Shmerling and Lisa Esther Lebovic

FEB 04 2015

Tanya A. Smolik
DEPUTY CLERK

Date Filed	2/4/15
Payment #	52418
CA	CK CC MO CG
Amount	200
Payor	JOSEPH H. NEIMAN
Batch/Ref/Case #	8248

STUART REICHMAN, KAREN BETH
SMERLING, and LISA ESTHER
LEBOVIC,

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - BERGEN COUNTY

Docket No. L-1255-15

Plaintiffs,

Civil Action

vs.

**COMPLAINT AND
JURY DEMAND**

WILLIAM PENN LIFE INSURANCE
COMPANY OF NEW YORK,

Defendant.

CP
5/9
Plaintiffs, Stuart Reichman residing at 99 Griggs Avenue, Teaneck, in the Township of Teaneck, County of Bergen and State of New Jersey, Karen Beth Shmerling, residing at pob 144 Kochav Hashachar, Mizrach Binyamin 90641, Israel and Lisa Esther Lebovic residing at Baba Sali 11/2, Betar Illit, Israel by and through their attorney, Joseph H. Neiman, Esq., complaining of the above Defendant alleges as follows upon information and belief:

COUNT ONE
Breach of Contract

1. Plaintiffs, Stuart Reichman, Karen Beth Shmerling, and Lisa Esther Lebovic are the sole beneficiaries of the Estate of Arom Reichman.

2. Defendant, William Penn Life Insurance Company of New York, is an insurance company with its offices located at 100 Quentin Roosevelt Boulevard, Garden

City, New York and is authorized to do business in the State of New Jersey and/or actually does business in the State of New Jersey.

3. Avrom Reichman entered into a Life Insurance Contract, Policy No. 0700012524 with William Penn Life Insurance Company of New York naming Stuart Reichman, Karen Reichman Shmerling, and Lisa Reichman Lebovic and Dianne Golub beneficiaries of the policy.

4. Said policy was in force when Avrom Reichman passed away on October 20, 2012.

5. Avrom Reichman and Dianne Golub were divorced on or about January 10, 1996, revoking any benefits due Dianne Golub by statute.

6. Diane Golub Rosenberg has signed an Affidavit of Renunciation and Renunciation of the Life Insurance Proceeds.

7. Despite due demand, Defendant, William Penn Life Insurance Company of New York has wrongfully withheld the insurance proceeds due to Stuart Reichman, Karen Beth Shmerling, and Lisa Esther Lebovic.

WHEREFORE, Plaintiffs demand judgment in favor of the Plaintiffs and against the Defendant in the amount of \$100,000.00, trebled damages, punitive damages, plus interest, attorney's fees, costs of suit and for such other and further relief as this court deems just and proper.

COUNT TWO
Consumer Fraud

1. Plaintiffs repeat and reiterate each and every allegation set forth in the First Count as though same were set forth at length herein.

2. Defendant's failure to pay is part of a scheme to accept payments and deny legitimate claims.

3. Said conduct is a violation of the NJ Consumer Fraud Act.

WHEREFORE, Plaintiffs demand judgment in favor of the Plaintiffs and against the Defendant in the amount of \$100,000.00, trebled damages, punitive damages, plus interest, attorney's fees, costs of suit and for such other and further relief as this court deems just and proper.

COUNT THREE
Fraud

1. Plaintiffs repeat and reiterate each and every allegation set forth in the First and Second Counts as though same were set forth at length herein.

2. Any and all denials by defendant to pay the legitimate claims of plaintiffs were done so fraudulently.

WHEREFORE, Plaintiffs demand judgment in favor of the Plaintiffs and against the Defendant in the amount of \$100,000.00, trebled damages, punitive damages, plus interest, attorney's fees, costs of suit and for such other and further relief as this court deems just and proper.

Dated: January 29, 2015


Joseph H. Neiman, Esq.
Attorney for Plaintiffs

JURY DEMAND

PLEASE TAKE NOTICE that Plaintiffs, Stuart Reichman, Karen Beth Shmerling, and Lisa Esther Lebovic, hereby demand a trial by jury on all issues so triable.

Dated: January 29, 2015


Joseph H. Neiman, Esq.
Attorney for Plaintiffs

CERTIFICATION

In accordance with the Rules, the undersigned hereby certifies that the within matter is not the subject of any other action pending in any other court or pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated.

Dated: January 29, 2015


Joseph H. Neiman, Esq.
Attorney for Plaintiff

Joseph H. Neiman

ATTORNEY AT LAW

85 MAIN STREET, SUITE 302
HACKENSACK, NEW JERSEY 07601

TEL: (201) 487-0061

FAX: (201) 883-0767

E-MAIL: jneiman.esq@gmail.com

NEW YORK OFFICE

MEMBER NJ & NY BAR

FEB 23 2015

179-36 80TH ROAD
JAMAICA ESTATE, NEW YORK 11432

February 17, 2015

WM. PENN LIFE INS. CO. OF N.Y.
RECEIVED

FEB 23 2015

CLAIMS DEPT.

VIA CERTIFIED MAIL

William Penn Life Insurance Company
100 Quentin Roosevelt Boulevard
P.O. Box 519
Garden City, NY 11530

Attention: Legal Department

RE: Reichman, et als. vs. William Penn Life Insurance Company of New York
Docket No. BER-L-1255-15

Dear Sir:

Enclosed please find a summons and complaint against William Penn Life Insurance Company of New York with regard to the above-referenced matter which I hereby serve upon you. I am also enclosing a copy of the Track Assignment Notice with regard to this matter. Please advise if you will accept service of process via mail by signing and faxing a copy of this letter to me or if you wish to be served through a process server.

Very truly yours,

J
Joseph H. Neiman

JHN: djb
Enclosures

I hereby accept service of process of the
Within Summons and Complaint this
____ day of _____, 2015

Name:

Title:

Letters to court/S&C via certified mail, Reichman, Wm Penn

Attorney (s): **JOSEPH H. NEIMAN, ESQ.**
Law Firm:
Address: **85 MAIN STREET, SUITE 302**
HACKENSACK, NEW JERSEY 07601

Telephone No.: **(201) 487-0061**
Fax No.: **(201) 883-0767**
Attorney (s) for Plaintiff (s):

**STUART REICHMAN, KAREN BETH
SMERLING, and LISA ESTHER
LEBOVIC,**

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – BERGEN COUNTY**

Plaintiffs,

DOCKET NO. L-1255-15

vs.

Civil Action

**WILLIAM PENN LIFE INSURANCE
COMPANY OF NEW YORK,**

SUMMONS

Defendant.

From the State of New Jersey
To the Defendants (s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deputyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

Dated: February 17, 2015



Michelle M. Smith, Clerk of the Superior Court

Name of Defendant to be Served:	William Penn Life Insurance Company of New York Legal Department 100 Quentin Roosevelt Boulevard P.O. Box 519 Garden City, NY 11530
Address for the Defendant to be Served:	

Note: The Case Information Statement is available at www.njcourts.com

**Directory of Superior Court Deputy Clerk's Offices
County Lawyer Referral and Legal Services Offices**

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401

LAWYER REFERRAL
(609) 345-3444
LEGAL SERVICES
(609) 348-4200

BERGEN COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601

LAWYER REFERRAL
(201) 488-0044
LEGAL SERVICES
(201) 487-2166

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Fl., Courts Facility
49 Rancocas Rd.
Mt. Holly, NJ 08060

LAWYER REFERRAL
(609) 261-4862
LEGAL SERVICES
(609) 261-1088

CAMDEN COUNTY:

Deputy Clerk of the Superior Court
Civil Processing Office
Hall of Justice
1st Fl., Suite 150
101 South 5th Street
Camden, NJ 08103

LAWYER REFERRAL
(856) 482-0618
LEGAL SERVICES
(856) 964-2010

CAPE MAY COUNTY:

Deputy Clerk of the Superior Court
9 N. Main Street
Cape May Court House, NJ 08210

LAWYER REFERRAL
(609) 463-0313
LEGAL SERVICES
(609) 465-3001

CUMBERLAND COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
60 West Broad Street
P.O. Box 10
Bridgeton, NJ 08302

LAWYER REFERRAL
(856) 696-5550
LEGAL SERVICES
(856) 691-0494

ESSEX COUNTY:

Deputy Clerk of the Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102

LAWYER REFERRAL
(973) 622-6204
LEGAL SERVICES
(973) 624-4500

GLOUCESTER COUNTY:
Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
First Fl., Court House
1 North Broad Street
Woodbury, NJ 08096

LAWYER REFERRAL
(856) 848-4589
LEGAL SERVICES
(856) 848-5360

HUDSON COUNTY:
Deputy Clerk of the Superior Court
Superior Court, Civil Records Dept.
Brennan Court House--1st Floor
583 Newark Ave.
Jersey City, NJ 07306

LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6363

HUNTERDON COUNTY:
Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822

LAWYER REFERRAL
(908) 236-6109
LEGAL SERVICES
(908) 782-7979

MERCER COUNTY:
Deputy Clerk of the Superior Court
Local Filing Office, Courthouse
175 S. Broad Street, P.O. Box 8068
Trenton, NJ 08650

LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

MIDDLESEX COUNTY:
Deputy Clerk of the Superior Court,
Middlesex Vicinage
2nd Floor - Tower
56 Paterson Street, P.O. Box 2633
New Brunswick, NJ 08903-2633

LAWYER REFERRAL
(732) 828-0053
LEGAL SERVICES
(732) 249-7600

MONMOUTH COUNTY:
Deputy Clerk of the Superior Court
Court House
P.O. Box 1269
Freehold, NJ 07728-1269

LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

MORRIS COUNTY:
Morris County Courthouse
Civil Division
Washington and Court Streets
P. O. Box 910
Morristown, NJ 07963-0910

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 285-6911

OCEAN COUNTY:
Deputy Clerk of the Superior Court
118 Washington Street, Room 121
P.O. Box 2191
Toms River, NJ 08754-2191

LAWYER REFERRAL
(732) 240-3666
LEGAL SERVICES
(732) 341-2727

PASSAIC COUNTY:
Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505

LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 523-2900

SALEM COUNTY:
Deputy Clerk of the Superior Court
Attn: Civil Case Management Office
92 Market Street
Salem, NJ 08079

LAWYER REFERRAL
(856) 935-5629
LEGAL SERVICES
(856) 691-0494

SOMERSET COUNTY:
Deputy Clerk of the Superior Court
Civil Division
P.O. Box 3000
40 North Bridge Street
Somerville, N.J. 08876

LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840

SUSSEX COUNTY:
Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

UNION COUNTY:
Deputy Clerk of the Superior Court
1st Fl., Court House
2 Broad Street
Elizabeth, NJ 07207-6073

LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

WARREN COUNTY:
Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07823-1500

LAWYER REFERRAL
(908) 859-4300
LEGAL SERVICES
(908) 475-2010

BERGEN COUNTY COURTHOUSE
SUPERIOR COURT LAW DIV
BERGEN COUNTY JUSTICE CTR RM 415
HACKENSACK NJ 07601-7680

COURT TELEPHONE NO. (201) 527-2600
COURT HOURS 8:30 AM - 4:30 PM

TRACK ASSIGNMENT NOTICE

DATE: FEBRUARY 09, 2015
RE: REICHMAN VS WILLIAM PENN LIFE INSURANCE COMPANY
DOCKET: BER L -001255 15

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON ESTELA M. DE LA CRUZ

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002
AT: (201) 527-2600.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: JOSEPH H. NEIMAN, ESQ.
NEIMAN JOSEPH H
85 MAIN STREET
SUITE 302
HACKENSACK NJ 07601

JUBCAR7

PARKING NOTICE

Through July 31, 2015

Visitors to the Justice Center are
directed to the Lot located at
150 River St., Hackensack.

Regular shuttles round trip
available from 7:30 am to 7:00 pm

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS) Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed		<small>FOR USE BY CLERK'S OFFICE ONLY</small> PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA CHG/CK NO. AMOUNT: OVERPAYMENT: BATCH NUMBER:
ATTORNEY / PRO SE NAME Joseph H. Neiman		TELEPHONE NUMBER (201) 487-0061	COUNTY OF VENUE Bergen
FIRM NAME (if applicable)		DOCKET NUMBER (when available) L-1255-15	
OFFICE ADDRESS 85 Main Street, Suite 302 Hackensack, NJ 07601		DOCUMENT TYPE Complaint	
		JURY DEMAND <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
NAME OF PARTY (e.g., John Doe, Plaintiff) Plaintiffs, Stuart Reichman, Karen Beth Smerling and Lisa Esther Lebovic		CAPTION Stuart Reichman, Karen Beth Smerling and Lisa Esther Lebovic vs. William Penn Life Insurance Company of New York	
CASE TYPE NUMBER <small>(See reverse side for listing)</small> 599		HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
		IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <small>IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.</small>	
RELATED CASES PENDING? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<small>IF YES, LIST DOCKET NUMBERS</small>	
DO YOU ANTICIPATE ADDING ANY PARTIES <small>(arising out of same transaction or occurrence)?</small> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN	
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.			
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION			
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<small>IF YES, IS THAT RELATIONSHIP:</small> <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input checked="" type="checkbox"/> BUSINESS	
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION			
Do you or your client need any disability accommodations? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<small>IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION</small>	
Will an interpreter be needed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<small>IF YES, FOR WHAT LANGUAGE?</small>	
<small>I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).</small>			
ATTORNEY SIGNATURE:			

SUPERIOR COURT BERGEN COUNTY
FILED

Date Filed	2/4/15			
Payment #	5248			
CA	CK	CC	MO	CG
Amount <u>200</u>				
Payor <u>JOSEPH H. NEIMAN</u>				
Batch/Ref/Case # <u>848</u>				

JOSEPH H. NEIMAN

Attorney at Law

ID No. 013541985

85 Main Street, Suite 302

Hackensack, New Jersey 07601

(201) 487-0061

Attorney for Plaintiff, Stuart Reichman, Karen Beth Shmerling and Lisa Esther Lebovic

FEB 04 2015

Tamra G. Smerling
DEPUTY CLERKSTUART REICHMAN, KAREN BETH
SMERLING, and LISA ESTHER
LEBOVIC,SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - BERGEN COUNTYDocket No. L-1255-15

Plaintiffs,

Civil Action

vs.

WILLIAM PENN LIFE INSURANCE
COMPANY OF NEW YORK,COMPLAINT AND
JURY DEMAND

Defendant.

Plaintiffs, Stuart Reichman residing at 99 Griggs Avenue, Teaneck, in the Township of Teaneck, County of Bergen and State of New Jersey, Karen Beth Shmerling, residing at pob 144 Kochav Hashachar, Mizrach Binyamin 90641, Israel and Lisa Esther Lebovic residing at Baba Sali 11/2, Betar Illit, Israel by and through their attorney, Joseph H. Neiman, Esq., complaining of the above Defendant alleges as follows upon information and belief:

COUNT ONE
Breach of Contract

1. Plaintiffs, Stuart Reichman, Karen Beth Shmerling, and Lisa Esther Lebovic are the sole beneficiaries of the Estate of Arom Reichman.
2. Defendant, William Penn Life Insurance Company of New York, is an insurance company with its offices located at 100 Quentin Roosevelt Boulevard, Garden

City, New York and is authorized to do business in the State of New Jersey and/or actually does business in the State of New Jersey.

3. Avrom Reichman entered into a Life Insurance Contract, Policy No. 0700012524 with William Penn Life Insurance Company of New York naming Stuart Reichman, Karen Reichman Shmerling, and Lisa Reichman Lebovic and Dianne Golub beneficiaries of the policy.

4. Said policy was in force when Avrom Reichman passed away on October 20, 2012.

5. Avrom Reichman and Dianne Golub were divorced on or about January 10, 1996, revoking any benefits due Dianne Golub by statute.

6. Diane Golub Rosenberg has signed an Affidavit of Renunciation and Renunciation of the Life Insurance Proceeds.

7. Despite due demand, Defendant, William Penn Life Insurance Company of New York has wrongfully withheld the insurance proceeds due to Stuart Reichman, Karen Beth Shmerling, and Lisa Esther Lebovic .

WHEREFORE, Plaintiffs demand judgment in favor of the Plaintiffs and against the Defendant in the amount of \$100,000.00, trebled damages, punitive damages, plus interest, attorney's fees, costs of suit and for such other and further relief as this court deems just and proper.

COUNT TWO
Consumer Fraud

1. Plaintiffs repeat and reiterate each and every allegation set forth in the First Count as though same were set forth at length herein.

2. Defendant's failure to pay is part of a scheme to accept payments and deny legitimate claims.

3. Said conduct is a violation of the NJ Consumer Fraud Act.

WHEREFORE, Plaintiffs demand judgment in favor of the Plaintiffs and against the Defendant in the amount of \$100,000.00, trebled damages, punitive damages, plus interest, attorney's fees, costs of suit and for such other and further relief as this court deems just and proper.

COUNT THREE
Fraud

1. Plaintiffs repeat and reiterate each and every allegation set forth in the First and Second Counts as though same were set forth at length herein.

2. Any and all denials by defendant to pay the legitimate claims of plaintiffs were done so fraudulently.

WHEREFORE, Plaintiffs demand judgment in favor of the Plaintiffs and against the Defendant in the amount of \$100,000.00, trebled damages, punitive damages, plus interest, attorney's fees, costs of suit and for such other and further relief as this court deems just and proper.

Dated: January 29, 2015


Joseph H. Neiman, Esq.
Attorney for Plaintiffs

JURY DEMAND

PLEASE TAKE NOTICE that Plaintiffs, Stuart Reichman, Karen Beth Shmerling, and Lisa Esther Lebovic, hereby demand a trial by jury on all issues so triable.

Dated: January 29, 2015



Joseph H. Neiman, Esq.
Attorney for Plaintiffs

CERTIFICATION

In accordance with the Rules, the undersigned hereby certifies that the within matter is not the subject of any other action pending in any other court or pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated.

Dated: January 29, 2015



Joseph H. Neiman, Esq.
Attorney for Plaintiff